

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal Number 1:04cr421
	)	
MICHELLE I. PAPPADAKIS,	)	
a/k/a Michelle Ivanchukov,	)	
	)	
Defendant	)	

STATEMENT OF FACTS

The United States and the defendant, MICHELLE I. PAPPADAKIS, a/k/a Michelle Ivanchukov, agree that had this matter proceeded to trial, the United States would have proven the facts outlined below beyond a reasonable doubt.

1. From at least April 2000 through August 2004, the defendant was the vice president of Global Recruitment and Immigration Services, Inc. (Global). Global was located at 6521 Arlington Boulevard, Suite 400, Falls Church, Virginia, in the Eastern District of Virginia. A substantial part of Global's business involved assisting aliens who were seeking permanent residence in the United States to obtain “green cards” through an employment-based visa program.

2. Title 31, United States Code, Section 5313(a) and related regulations require a financial institution to file a currency transaction report when a customer deposits an amount greater than \$10,000 in a single day.

3. During the course of the offenses described below, Global had revenue of approximately \$3.2 million. The defendant and Global’s president, Naran S. Ivanchukov, caused

Global to conduct much of Global's business in cash and to regularly keep cash for the payment of the defendants' personal and business expenses in a safe at Global, rather than depositing the cash in Global's bank accounts.

4. The defendant and Naran S. Ivanchukov caused Global to structure the cash deposits that Global made at its bank, by purposefully making deposits of cash in amounts less than \$10,000, so as to avoid triggering a currency transaction report by Global's bank, thereby evading the reporting requirements of 31 U.S.C. § 5313(a) and related regulations.

5. On or about February 19, 2003, the defendant sent an electronic mail message instructing an underling at Global to deposit \$15,000 in cash into a Global account at Bank of America, but to structure the transaction in two \$7,500 deposits on different days, in order to avoid "IRS flags."

6. On or about February 20, 2003, and pursuant to the defendant's instructions, the underling at Global deposited \$7,500 in cash into the Global bank account.

7. On or about February 21, 2003, and pursuant to the defendant's instructions, the underling at Global deposited an additional \$7,500 in cash into a Global bank account.

8. On or about February 25 and 26, 2004, the defendant and Naran S. Ivanchukov caused Global to make two structured deposits of cash into Global's Bank of America account, each deposit in the amount of \$7,500, for a total of \$15,000.

9. On or about June 18 and 19, 2004, the defendant and Naran S. Ivanchukov caused Global to make two structured deposits of cash into Global's Bank of America account, each deposit in the amount of \$9,000, for a total of \$18,000.

10. On or about August 26 and 27, 2004, the defendant and Naran S. Ivanchukov caused Global to make two structured deposits of cash into Global's Bank of America account, each deposit in the amount of \$5,000, for a total of \$10,000.

11. For purposes of this statement of facts, the defendant agrees that the value of the funds involved in structured transactions caused by the defendant and Naran S. Ivanchukov was greater than \$30,000 but not greater than \$70,000.

12. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

13. The actions of the defendant as recounted above were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

PAUL J. McNULTY  
UNITED STATES ATTORNEY

By: \_\_\_\_\_  
James P. Gillis  
Assistant United States Attorney

Defendant's Stipulation and Signature

After consulting with my attorney and pursuant to the plea agreement I have entered into this day with the United States, I hereby stipulate that the above statement of facts is true and accurate, and that had the matter proceeded to trial, the United States would have proven the same beyond a reasonable doubt.

\_\_\_\_\_  
Michelle I. Pappadakis  
Defendant

Defense Counsel's Signature

I am the defendant's attorney. I have carefully reviewed the above statement of facts with the defendant. To my knowledge, the defendant's decision to stipulate to these facts is an informed and voluntary one.

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Alan H. Yamamoto  
Counsel to the Defendant